

From: [Gary Moore](#)  
To: [Stephen Halasz](#)  
Cc: [Richard Bergner](#)  
Subject: Falcon Refinery  
Date: 01/20/2012 12:00 PM

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Stephen:

It appears that better progress is being made to complete this action. I am trusting that you guys have the funding and a sense of urgency to complete these tasks in an expedited manner since NORCO failed to meet the December 31, 2011 deadline. I will not put up with delays so you, Mr. Bergner, or others need to give authority and clear direction to your staff and contractors so that they can effectively complete the action without delay.

1. I am surprised that Tank 21 has not yet been containerized and disposed. I am sure that you have increased your costs due to additional rainfall. I expect this material to be containerized and disposed by 1/27/12 as was indicated.
2. It was my understanding that the butane tank was complete and all that was left was steam cleaning the tank. Apparently, the material is still in the tank. I expect this material to be containerized and disposed by 1/27/12 as was indicated.
3. It is my understanding that Tank 30 and Tank 12 can not be completely cleaned out until the collapsed roofs have been removed from the interiors of the tanks. This should have been anticipated and should have already been scheduled to be done so that the waste in these tanks could be effectively removed. **I want this done immediately!!!!!!**
4. It is my understanding that Tank 7 liquids are being transferred to Tank 26. The remaining sludge shall be removed immediately and disposed. It is my opinion that this should be done more quickly than 2/16/2012.
5. It is my understanding that you guys are going to set up the treatment system and begin treating the water in Tank 26 on a batch basis so that you will be ready to start irrigating the clean water when you are authorized. This set up needs to be done immediately and the treatment system and treated water storage needs to be put in place. I expect a timeline on when equipment will be in place and when treatment starts as well as updates on the quality of the water produced from the treatment system.
6. It is my understanding that you guys are removing materials from piping as you go. Ultimately, I want a certification that you guys have done this task.
7. **As you know, for any tank that you intend to keep you are required to do the proper API inspection. If it is determined that the tank bottom has been compromised where liquid may have released below the tank then the tank bottom is to be removed and any residual oil contamination (ie. oil contaminated soils) below the tank shall be removed and properly disposed. This applies to all tankage and should be scheduled immediately after the tank has been cleaned and gas freed.**
8. Also, you are required to inspect the facility for any visual oil contamination and



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remove and dispose of such contamination. The RI/FS and RD/RA will deal with any contamination that is not visible based upon analytics and cleanup standards.

I hope the above is clear and you can get this project complete in a expedited fashion.

Thanks

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